

Javier L. Merino, Esq.
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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

HOLLY RINGLING, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

BETMGM, LLC,

Defendant.

Civil Action No.: 2:22-cv-07462-JXN-CLW

CERTIFICATION OF BRIAN D. FLICK
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE*

I, BRIAN D. FLICK certify as follows pursuant to Local Civil Rule 101.1(c):

1. I am a Partner with the DannLaw Firm, with my principal office located at 15000 Madison Avenue, Lakewood, Ohio 44107 (216) 373-0539, attorneys for Plaintiff, Holly Ringling, individually and on behalf of all others similarly situated (collectively, “Plaintiffs”) in the above-captioned matter. I am fully familiar with the facts and circumstances surrounding this litigation, and I submit this declaration in support of Plaintiffs’ application for an Order admitting me as counsel *pro hac vice* in this action and in any related mediation or arbitration.

2. I have been admitted to practice before the following courts in the years indicated:

- a. United States Court of Appeals for the Sixth Circuit, 2016
- b. United States District Court for the Northern District of Ohio, 2014
- c. United States District Court for the Southern District of Ohio, 2007
- d. United States District Court for the District of Colorado, 2020
- e. United States District Court for the Northern District of Illinois, 2016
- f. United States District Court for the Northern District of Indiana, 2016
- g. United States District Court for the Southern District of Indiana, 2020
- h. United States District Court for the Eastern District of Kentucky, 2013
- i. United States District Court for the Western District of Kentucky, 2015
- j. United States District Court for the Eastern District of Michigan, 2016
- k. United States District Court for the Western District of Michigan, 2020
- l. United States District Court for the Eastern District of Tennessee, 2015
- m. United States District Court for the Western District of Tennessee, 2019

3. I am currently, and continuously have been since the dates indicated above, a member in good standing in each of those jurisdictions. To my knowledge, no charges have been brought against me regarding my practice in those jurisdictions, and I am not suspended or disbarred.

4. I have never been convicted of a felony or a crime, nor have I been censured, suspended, disciplined or disbarred by any court, nor do I have any disciplinary or contempt proceedings involving me pending before any court, nor have I been denied admission to any court during the last five years.

5. I agree to abide by the ethical standards governing the practice of law in this Court pursuant to the New Jersey State Lawyer's Code of Professional Responsibility and submit to this Court's Local Rules. I will comply with all provisions of Local Rule 101.1(c).

6. Pursuant to the rules of this Court, all papers filed on behalf of Defendants will be filed by local counsel Javier L. Merino, Esq., or another attorney admitted in the State of New Jersey.

7. All fees to the Clerk of the Court and the New Jersey Lawyers' Fund for Client Protection shall be timely made.

8. The purpose of this application is to make it possible for me to represent Plaintiffs, which has sought my advice and assistance with respect to this litigation.

9. For the foregoing reasons, I respectfully request this Court admit me *pro hac vice* in the above-entitled action.

I declare, under penalty of perjury, that the foregoing is true and correct.

Date: February 13, 2023

Respectfully submitted,

THE DANN LAW FIRM, P.C.

/s/ Brian D. Flick

Brian D. Flick (OH #0081605)*

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**Pro Hac Vice Pending*

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Counsel for Plaintiff

Holly Ringling and the Putative Class